

## **FY 2018 Annual Freedom of Information Act Report of the Legal Services Corporation**

The Legal Services Corporation ("LSC" or "Corporation") was established as a private, non-membership, non-profit corporation by the Legal Services Corporation Act, Pub. L. 93-355 (1974), as amended, 42 U.S.C. § 2996 *et seq.* Section 2996(g) of Title 42 provides that the Corporation is subject to the requirements of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. This report is submitted pursuant to FOIA and relates to the Corporation's FOIA activities for the period from October 1, 2017 through September 30, 2018.

The Congress of the United States, in the declaration of purpose of the Legal Services Corporation Act, found that "there is a need to provide equal access to the system of justice in our Nation for individuals who seek redress of grievances," that "there is a need to provide high quality legal assistance to those who would be otherwise unable to afford adequate legal counsel," [...and that] "providing legal assistance to those who face an economic barrier to adequate legal counsel will serve best the ends of justice and assist in improving opportunities for low-income persons." In keeping with these congressional findings LSC's mission is:

**To promote equal access to justice in our Nation and to provide high quality civil legal assistance to low-income persons.**

## **I. BASIC INFORMATION REGARDING REPORT**

1. Following are the persons available to discuss this report:

**Ronald S. Flagg**

Vice President for Legal Affairs, General Counsel, Corporate Secretary and  
Chief FOIA Officer

Legal Services Corporation

3333 K Street, N.W.

Washington, DC 20007-3522

Telephone: (202) 295-1500

[flaggr@lsc.gov](mailto:flaggr@lsc.gov)

and

**Cheryl A. DuHart**

FOIA Analyst

Office of Legal Affairs

Legal Services Corporation

3333 K Street, N.W.

Washington, DC 20007-3522

Telephone: (202) 295-1500

[duhartc@lsc.gov](mailto:duhartc@lsc.gov)

2. This report is available in the **FOIA** section of LSC's website at:  
<http://www.lsc.gov/about-lsc/foia/foia-reports>
3. A copy of this report may be obtained in paper form by submitting a written request for "LSC's FY 2018 Annual FOIA Report" to:

**Cheryl A. DuHart**

FOIA Analyst

Office of Legal Affairs

Legal Services Corporation

3333 K Street, N.W.

Washington, DC 20007-3522

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Facsimile: (202) 337-6519

## II. MAKING A FOIA REQUEST

LSC's FOIA Handbook provides a brief overview of the history and purpose of FOIA, and explains how to submit a FOIA request for LSC records.

The handbook is available at <http://www.lsc.gov/about-lsc/foia/foia-handbook>

1. Following are the LSC offices to which FOIA requests may be submitted.

### **Office of Legal Affairs**

Legal Services Corporation  
3333 K Street, N.W.  
Washington, DC 20007-3522  
Telephone: (202) 295-1500  
[FOIA@lsc.gov](mailto:FOIA@lsc.gov)

### **Office of Inspector General**

Legal Services Corporation  
3333 K Street, N.W.  
Washington, DC 20007-3522  
Telephone: (202) 295-1500  
[FOIA@oig.lsc.gov](mailto:FOIA@oig.lsc.gov)

2. Some requests are denied in whole or in part because the material requested is either statutorily exempt from disclosure or the records requested are not in the possession of the Corporation. For example:
  - an individual's personal telephone number, personal electronic mail address, and residential address would be withheld pursuant to Exemption 6, which protects from disclosure information the release of which would result in the unwarranted invasion of personal privacy;
  - Similarly, personal information of a type that would normally be maintained in an employee's personnel or medical file would be withheld pursuant to Exemption 6; and
  - Records in the Corporation's possession related to an investigation of an LSC-funded grantee by LSC's Office of Inspector General may be withheld pursuant to Exemption 7(a), which protects information compiled for law enforcement purposes, the release of which could reasonably be expected to interfere with enforcement proceedings, due to an ongoing investigation and/or enforcement proceedings.

## III. ACRONYMS, DEFINITIONS, AND EXEMPTIONS

1. **LSC or Corporation** – refers to the Legal Services Corporation.
2. Definitions of terms used in this Report:
  - a. **Administrative Appeal** – a request to a federal agency asking that it review at

a higher administrative level a FOIA determination made by the agency at the initial request level.

- b. **Average Number** – the number obtained by dividing the sum of a group of numbers by the quantity of numbers in the group. For example, of 3, 7, and 14, the average number is 8.
- c. **Backlog** – the number of requests or administrative appeals that are pending at the end of the fiscal year that are beyond the statutory time period for a response.
- d. **Component** –The FOIA requires that agencies include in their Annual FOIA Report data for both the agency overall and for each principal component of the agency. In the case of LSC, there are two components that process FOIA requests: The Office of Inspector General (“OIG”) processes requests for records exclusively in the possession and control of the OIG, and, the Office of Legal Affairs (“OLA”) processes all other requests for LSC.
- e. **Consultation** – the procedure whereby LSC first forwards a record to another agency for its review because that other agency has an interest in the document. Once the agency in receipt of the consultation finishes its review of the record, it responds back to LSC, which then responds to the FOIA requester.
- f. **Exemption 3 Statute** – a federal statute that exempts information from disclosure and which LSC relies on to withhold information under subsection (b)(3) of the FOIA.
- g. **FOIA Request** – a FOIA request is generally a request for copies of records concerning the requester (i.e., “first party” requests), another person (i.e., a “third-party” request), an organization, or a particular topic of interest.

A FOIA request includes records referred to LSC for processing and direct response to the requester. It does not, however, include records for which LSC has received a consultation from another agency. (Consultations are reported separately in Section XII of this Report.) FOIA requests received by LSC are included in this Report.

- h. **Full Grant** – an agency decision to disclose all records in full in response to a FOIA request.
- i. **Full Denial** – an agency decision not to release *any* records in response to a FOIA request because the records are exempt in their entirety under one or more of the FOIA exemptions, or because of a procedural reason, such as when no records exist or could be located.

- j. **Median Number** – the middle, not average number. For example, of 3, 7, and 14, the median number is 7.
- k. **Multi-Track Processing** – a system in which simple requests requiring relatively minimal review are placed in one processing track and more voluminous and complex requests are placed in one or more other tracks. Requests granted expedited processing are placed in yet another track. Requests in each track are processed on a first in/first out basis.
  - i. **Expedited Processing** – LSC will process a FOIA request on an expedited basis when a requester satisfies the requirements for expedited processing as set forth in FOIA and at 45 C.F.R. Part 1602, the regulation that implements FOIA for LSC.
  - ii. **Simple Request** – a FOIA request that LSC places in its fastest (non-expedited) track based on the low volume and/or simplicity of the records requested.
  - iii. **Complex Request** – a FOIA request that LSC places in a slower track based on the high volume and/or complexity of the records requested.
- l. **Partial Grant/Partial Denial** – in response to a FOIA request, LSC's decision to disclose portions of the records and to withhold other portions that are exempt under the FOIA, or to otherwise deny a portion of the request for a procedural reason.
- m. **Pending Request or Pending Administrative Appeal** – a request or administrative appeal for which LSC has not taken final action in all respects.
- n. **Perfected Request** – a request for records which reasonably describes such records and is made in accordance with published rules stating the time, place, fees (if any) and procedures to be followed.
- o. **Processed Request or Processed Administrative Appeal** a request or administrative appeal for which LSC has taken final action in all respects.
- p. **Range in Number of Days** – the lowest and highest number of days to process requests or administrative appeals.
- q. **Time Limits** – the time period in the statute for an agency to respond to a FOIA request (ordinarily twenty working days from receipt of a perfected FOIA request).

3. Concise descriptions of the nine FOIA exemptions:
- a. **Exemption 1:** classified national defense and foreign relations information
  - b. **Exemption 2:** information that is related solely to the internal personnel rules and practices of an agency
  - c. **Exemption 3:** information that is prohibited from disclosure by another federal law
  - d. **Exemption 4:** trade secrets and other confidential business information
  - e. **Exemption 5:** inter-agency or intra-agency communications that are protected by legal privileges
  - f. **Exemption 6:** information involving matters of personal privacy
  - g. **Exemption 7:** records or information compiled for law enforcement purposes, to the extent that the production of those records (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions or would disclose guidelines for law enforcement investigations or prosecutions, or (F) could reasonably be expected to endanger the life or physical safety of any individual
  - h. **Exemption 8:** information relating to the supervision of financial institutions
  - i. **Exemption 9:** geological information on wells
- i.

#### IV. EXEMPTION 3 STATUTES

Component	Statute	Type of Information Withheld	Case Citation	Number of Times Relied upon by Agency/Component	Total Number of Times Relied upon by Agency Overall
<b>OLA</b>	N/A	N/A	N/A	0	0
<b>OIG</b>	N/A	N/A	N/A	0	0

#### V. FOIA REQUESTS

##### A. Received, Processed and Pending FOIA Requests

Component	Number of Requests Pending as of Start of Fiscal Year	Number of Requests Received in Fiscal Year	Number of Requests Processed in Fiscal Year	Number of Requests Pending as of End of Fiscal Year
<b>OLA</b>	0	24	20	4
<b>OIG</b>	0	3	3	0
<b>AGENCY OVERALL</b>	0	27	23	4

**V.B. (1) Disposition of FOIA Requests -- All Processed Requests**

Component	Number of Full Grants	Number of Partial Grants/ Partial Denials	Number of Full Denials Based on Exemptions	Number of Full Denials Based on Reasons Other than Exemptions									TOTAL
				No Records	All Records Referred to Another Component or Agency	Request With-drawn	Fee-Related Reason	Records Not Reasonably Described	Improper FOIA Request for Other Reason	Not Agency Record	Duplicate Request	Other *Explain in chart below	
OLA	14	6	0	0	0	0	0	0	0	0	0	0	20
OIG	1	2	0	0	0	0	0	0	0	0	0	0	3
AGENCY OVERALL	15	8	0	0	0	0	0	0	0	0	0	0	23

**V.B. (2) Disposition of FOIA Requests -- “Other” Reasons for “Full Denials Based on Reasons Other Than Exemptions”**

<b>Component</b>	<b>Description of "Other" Reasons for Denials from Chart B (1)</b>	<b>Number of Times "Other" Reason Was Relied Upon</b>	<b>TOTAL</b>
<b>OLA</b>	N/A	0	0
<b>OIG</b>	N/A	0	0
<b>AGENCY OVERALL</b>	N/A	0	0

**V.B. (3) Disposition of FOIA Requests -- Number of Times Exemptions Applied**

<b>Component</b>	<b>Ex. 1</b>	<b>Ex. 2</b>	<b>Ex. 3</b>	<b>Ex. 4</b>	<b>Ex. 5</b>	<b>Ex. 6</b>	<b>Ex. 7(A)</b>	<b>Ex. 7(B)</b>	<b>Ex. 7(C)</b>	<b>Ex. 7(D)</b>	<b>Ex. 7(E)</b>	<b>Ex. 7(F)</b>	<b>Ex. 8</b>	<b>Ex. 9</b>
<b>OLA</b>	0	0	0	1	1	6	0	0	1	0	0	0	0	0
<b>OIG</b>	0	0	0	0	0	2	0	0	2	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	1	1	8	0	0	3	0	0	0	0	0

## **VI. ADMINISTRATIVE APPEALS OF INITIAL DETERMINATIONS OF FOIA REQUESTS**

### **A. Received, Processed and Pending Administrative Appeals**

<b>Component</b>	<b>Number of Appeals Pending as of Start</b>	<b>Number of Appeals Received in Fiscal Year</b>	<b>Number of Appeals Processed in Fiscal Year</b>	<b>Number of Appeals Pending as of End of Fiscal Year</b>
<b>OLA</b>	0	1	0	1
<b>OIG</b>	0	1	0	1
<b>AGENCY OVERALL</b>	0	2	0	2

**VI.B. Disposition of Administrative Appeals -- All Processed Appeals**

<b>Component</b>	<b>Number Affirmed on Appeal</b>	<b>Number Partially Affirmed &amp; Partially Reversed/Remanded on Appeal</b>	<b>Number Completely Reversed/Remanded on Appeal</b>	<b>Number of Appeals Closed for Other Reasons</b>	<b>TOTAL</b>
OLA	0	0	0	0	0
OIG	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0	0

**VI.C. (1) Reasons for Denial on Appeal -- Number of Times Exemptions Applied**

<b>Component</b>	<b>Ex. 1</b>	<b>Ex. 2</b>	<b>Ex. 3</b>	<b>Ex. 4</b>	<b>Ex. 5</b>	<b>Ex. 6</b>	<b>Ex. 7(A)</b>	<b>Ex. 7(B)</b>	<b>Ex. 7(C)</b>	<b>Ex. 7(D)</b>	<b>Ex. 7(E)</b>	<b>Ex. 7(F)</b>	<b>Ex. 8</b>	<b>Ex. 9</b>
OLA	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OIG	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**VI.C. (2) Reasons for Denial on Appeal -- Reasons Other than Exemptions**

<b>Component</b>	<b>No Records</b>	<b>Records Referred at Initial Request Level</b>	<b>Request Withdrawn</b>	<b>Fee- Related Reason</b>	<b>Records not Reasonably Described</b>	<b>Improper Request for Other Reasons</b>	<b>Not Agency Record</b>	<b>Duplicate Request or Appeal</b>	<b>Request in Litigation</b>	<b>Appeal Based Solely on Denial of Request for Expedited Processing</b>	<b>Other  *Explain in chart below</b>
<b>OLA</b>	0	0	0	0	0	0	0	0	0	0	0
<b>OIG</b>	0	0	0	0	0	0	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0	0	0	0	0	0	0	0

**VI.C. (3) Reasons for Denial on Appeal – “Other” Reasons**

<b>Component</b>	<b>Description of “Other” Reasons for Denial on Appeal from Chart</b>	<b>Number of Times “Other” Reason Was Relied Upon</b>	<b>COMPONENT TOTAL</b>
<b>OLA</b>	N/A	0	0
<b>OIG</b>	N/A	0	0
<b>AGENCY OVERALL</b>	N/A	0	0

**VI.C. (4) Response Time for Administrative Appeals**

<b>Component</b>	<b>Median Number of Days</b>	<b>Average Number of Days</b>	<b>Lowest Number of Days</b>	<b>Highest Number of Days</b>
<b>OLA</b>	0	0	0	0
<b>OIG</b>	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0

**VI.C. (5) Ten Oldest Pending Administrative Appeals**

[illegible]

### VII.A. Processed Requests -- Response Time for All Processed Perfected Requests

Component	SIMPLE				COMPLEX				EXPEDITED PROCESSING			
	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days
OLA	9.5	10.85	1	32	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OIG	6	12.67	6	26	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AGENCY OVERALL	7.75	11.76	1	32	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### VII.B. Processed Requests -- Response Time for Perfected Requests in Which Information Was Granted

Component	SIMPLE				COMPLEX				EXPEDITED PROCESSING			
	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days
OLA	7	8.57	1	22	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OIG	6	6	6	6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AGENCY OVERALL	6.5	7.29	1	22	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### VII.C.1. Processed Requests -- Response Time in Day Increments – Simple Requests

[illegible]

### VII.C.2. Processed Requests -- Response Time in Day Increments – Complex Requests

[illegible]

### VII.C.3. Processed Requests -- Response Time in Day Increments – Expedited Requests

[illegible]

**VII. D. Pending Requests -- All Pending Perfected Requests**

Component	SIMPLE			COMPLEX			EXPEDITED PROCESSING		
	Number Pending	Median Number of Days	Average Number of Days	Number Pending	Median Number of Days	Average Number of Days	Number Pending	Median Number of Days	Average Number of Days
<b>OLA</b>	4	19	16.25	0	N/A	N/A	0	N/A	N/A
<b>OIG</b>	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
<b>AGENCY OVERALL</b>	4	19	16.25	0	N/A	N/A	0	N/A	N/A

#### VII. E. Pending Requests -- Ten Oldest Pending Perfected Requests

Component OLA	10th Oldest Request	9 <sup>th</sup>	8th	7th	6th	5th	4th	3rd	2nd	Oldest Request and Number of Days Pending
Date	N/A	N/A	N/A	N/A	N/A	N/A	09-27-18	09-24-18	09-10-18	08-31-18
Number of Days Pending	0	0	0	0	0	0	1	4	14	19
AGENCY OVERALL	0	0	0	0	0	0	1	4	14	19

[illegible]

### **VIII. A. Requests for Expedited Processing**

<b>Component</b>	<b>Number Granted</b>	<b>Number Denied</b>	<b>Median Number of Days to Adjudicate</b>	<b>Average Number of Days to Adjudicate</b>	<b>Number Adjudicated Within Ten Calendar Days</b>
<b>OLA</b>	0	0	N/A	N/A	N/A
<b>OIG</b>	0	0	N/A	N/A	N/A
<b>AGENCY OVERALL</b>	0	0	N/A	N/A	N/A

### **VIII. B. Requests for Fee Waiver**

<b>Component</b>	<b>Number Granted</b>	<b>Number Denied</b>	<b>Median Number of Days to Adjudicate</b>	<b>Average Number of Days to Adjudicate</b>
<b>OLA</b>	1	1	15	17
<b>OIG</b>	0	1	26	26
<b>AGENCY OVERALL</b>	1	2	20.5	21.5

## IX. FOIA PERSONNEL AND COSTS

Component	PERSONNEL			COSTS		
	Number of “Full-Time FOIA Employees”	Number of “Equivalent Full-Time FOIA Employees”	Total Number of “Full-Time FOIA Staff” (The sum of Columns 1 & 2	Processing Costs	Litigation- Related Costs	Total Costs
<b>OLA</b>	0	.57	.57	\$42,850	0	\$42,850
<b>OIG</b>	0	.026	.026	\$3,198	0	\$3,198
<b>AGENCY OVERALL</b>	0	.596	.596	\$46,048	0	\$46,048

## X. FEES COLLECTED FOR PROCESSING REQUESTS

Component	Total Amount of Fees Collected	Percentage of Total Costs
<b>OLA</b>	0	0%
<b>OIG</b>	0	0%
<b>AGENCY OVERALL</b>	0	0%

**XI.A. NUMBER OF TIMES SUBSECTION (C) USED**

<b>Component</b>	<b>Number of Times Subsection (C) Used</b>
<b>OLA</b>	0
<b>OIG</b>	0
<b>AGENCY OVERALL</b>	0

**XI.B. NUMBER OF SUBSECTION (A)(2) POSTINGS**

<b>Component</b>	Number of (a)(2) Records Posted by the FOIA Office	Number of (a)(2) Records Posted by Program Offices
<b>OLA</b>	713	2,276
<b>OIG</b>	0	257
<b>AGENCY OVERALL</b>	713	2,533

## **XII. A. Backlogs of FOIA Requests and Administrative Appeals**

<b>Component</b>	<b>Number of Backlogged Requests as of End of Fiscal Year</b>	<b>Number of Backlogged <i>Appeals</i> as of End of Fiscal Year</b>
<b>OLA</b>	0	0
<b>OIG</b>	0	0
<b>AGENCY OVERALL</b>	0	0

## **XII. B. Consultations on FOIA Requests – Received, Processed, and Pending Consultations**

<b>Component</b>	<b>Number of Consultations Received from Other Agencies that Were <u>Pending</u> at LSC as of <u>Start</u> of the Fiscal Year</b>	<b>Number of Consultations <u>Received</u> from Other Agencies During the Fiscal Year</b>	<b>Number of Consultations Received from Other Agencies that Were <u>Processed</u> by LSC During the Fiscal Year</b>	<b>Number of Consultations Received from Other Agencies that Were <u>Pending</u> at LSC as of <u>End</u> of the Fiscal Year</b>
<b>OLA</b>	0	0	0	0
<b>OIG</b>	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0

**XII. C. Consultations on FOIA Requests -- Ten Oldest Consultations Received from Other Agencies and Pending at LSC**

<b>Component OLA</b>	10 <sup>th</sup> Oldest Consultation	9 <sup>th</sup>	8 <sup>th</sup>	7 <sup>th</sup>	6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	3rd	2nd	Oldest Consultation and Number of Days Pending
<b>Date</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Number of Days Pending</b>	0	0	0	0	0	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0	0	0	0	0	0	0

<b>Component OIG</b>	10 <sup>th</sup> Oldest Consultation	9 <sup>th</sup>	8 <sup>th</sup>	7 <sup>th</sup>	6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	3rd	2nd	Oldest Consultation and Number of Days Pending
<b>Date</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Number of Days Pending</b>	0	0	0	0	0	0	0	0	0	0
<b>AGENCY OVERALL</b>	0	0	0	0	0	0	0	0	0	0

**XII. D.1. Comparison of Numbers of Requests from Previous and Current Annual Report**

Component	NUMBER OF REQUESTS <u>RECEIVED</u>		NUMBER OF REQUESTS <u>PROCESSED</u>	
	Number Received During Fiscal Year from Last Year's Annual Report	Number Received During Fiscal Year from Current Annual Report	Number Processed During Fiscal Year from Last Year's Annual Report	Number Processed During Fiscal Year from Current Annual Report
<b>OLA</b>	37	24	39	20
<b>OIG</b>	7	3	8	3
<b>AGENCY OVERALL</b>	44	27	47	23

**XII D.2. Comparison of Backlogged Requests from Previous and Current Annual Report**

Component	Number of Backlogged Requests as of End of the Fiscal Year from Previous Annual Report	Number of Backlogged Requests as of End of the Fiscal Year from Current Annual Report
<b>OLA</b>	0	0
<b>OIG</b>	0	0
<b>AGENCY OVERALL</b>	0	0

**XII. E.1. Comparison of Numbers of Administrative Appeals from Previous and Current Annual Report**

Component	NUMBER OF APPEALS <u>RECEIVED</u>		NUMBER OF APPEALS <u>PROCESSED</u>	
	Number Received During Fiscal Year from Last Year's Annual Report	Number Received During Fiscal Year from Current Annual Report	Number Processed During Fiscal Year from Last Year's Annual Report	Number Processed During Fiscal Year from Current Annual Report
<b>OLA</b>	0	1	0	0
<b>OIG</b>	0	1	0	0
<b>AGENCY OVERALL</b>	0	2	0	0

**XII. E.2. Comparison of Backlogged Administrative Appeals from Previous and Current Annual Report**

Component	Number of Backlogged Appeals as of End of the Fiscal Year from Previous Annual Report	Number of Backlogged Appeals as of End of the Fiscal Year from Current Annual Report
<b>OLA</b>	0	0
<b>OIG</b>	0	0
<b>AGENCY OVERALL</b>	0	0